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**From:** Bill Baldwin (MTHBLaw) [billbaldwin@mthblaw.com]  
**Sent:** Tuesday, May 03, 2011 1:56 PM  
**To:** Lynn Lewis Tavenner Esq (ltavenner@tb-lawfirm.com); Paula S. Beran Esq. (pberan@tb-lawfirm.com)  
**Cc:** 'Catherine.Nowery@ic.fbi.gov'  
**Subject:** Justin French  
**Attachments:** 2011-04-15 Email to Ebel and VanArsdale.pdf; order to debtor.pdf; 2010-11-16 French DOJ PFS Form.pdf

Lynn and Paula:

The first attachment is the email sent to Robert and Tom after the emergency hearing on the appointment of a trustee. The second attachment is a copy of the usual order to debtor on keeping track of estate assets etc. with highlights of language that raised concerns for me.

I received no reply to the email to Robert and Tom.

The third attachment is the financial affidavit submitted by French to the federal authorities in connection with their investigation prior to his guilty plea. We discussed this after court today.

The FBI agent who has custody of the French-related documents is Catherine Nowery, and she is available by email at [Catherine.Nowery@ic.fbi.gov](mailto:Catherine.Nowery@ic.fbi.gov). I am copying her with this email to confirm Justin French's standing consent, if required, to the Trustee having access to all of these documents on whatever terms work for the Government and the Trustee.

Regards,

Bill Baldwin

W. R. Baldwin, III, Esq. (VSB #16988)  
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[billbaldwin@comcast.net](mailto:billbaldwin@comcast.net)

## Exhibit B

### DECLARATION

I, Catherine L. Nowery, make this declaration under penalty of perjury.

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed for 13 years. I was the lead FBI agent on the investigation of Justin Glynn French. I participated in that investigation for over one year. Specifically, I participated in the execution of search warrants for documents, computers and business records related to French's business endeavors. I have also interviewed Justin French on multiple occasions regarding his financial condition and assets.

2. As a result of FBI seizures and evidence voluntarily turned over by French, the FBI received more than 160 items. I estimate that approximately 100 of the remaining items consist of banker's boxes of documents. In addition to the paper documents, the FBI imaged the hard drives of multiple computers seized from French or his business entities. The computers themselves were returned and the image copies retained by the FBI. I am not aware of any requests to review any of the seized documents and related materials.

3. From the documents I have reviewed and my interviews of French, I know that as of the time of his arrest in August 2010, French had some financial interest in over 136 limited liability companies or corporations. Many of these business entities held title to real property, often a property with which French and his companies were associated with some renovation project. In other instances, the business entities held title to real property which was leased. To date, the Government has forfeited French's membership interest in only four business entities. Thus, there remain numerous entities in which French has some interest, that have not been included in any order of forfeiture.

4. I know that French owned a house at 5917 Kensington Avenue in Richmond, VA where his mother-in-law resided until around May 2010. I believe the property was eventually foreclosed on by a lender. No forfeiture was sought for this property.

5. I know that French leased a condo in Miami, paying in advance for a one-year lease. The lease ran from around May 2010 to May 2011. French's wife and children, and occasionally French himself, resided at this condo during the lease period. The Government never sought to forfeit the lease on this property.

6. From reviewing credit card statements, I know that French made at least six unknown purchases generally described as jewelry, glassware, crystal, clock, silver, and silverware at stores including Tiffany and Company, Cartier and Schwarzschild Jewelry. These items ranged in price from \$1,544 to \$22,148. The FBI never located any of these items, and French was never able to explain the disposition of these items or identify their locations. I know that none of these items were listed in any forfeiture order because they could not be identified or located. I also know that French claimed to have a coins in a safe deposit box. I do not have an inventory

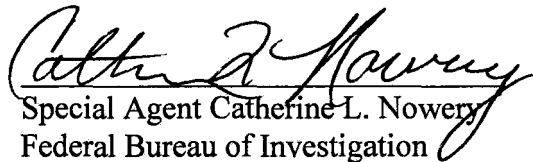
of these coins or their values, but I know they were not listed in any forfeiture order because they were never located and their value was not determined.

7. Between August 13, 2010, when French was initially arrested on state charges, and when he reported to the Bureau of Prisons in May 2011, I know that French leased and rented various automobiles. I also know that French was living in a hotel in Henrico County. I do not know the amount of the rent and lease obligations or the source of those payments. However, I believe he had access to income that was not forfeited and allowed him the ability to support minimal living expenses during that time period.

8. Finally, I know that French made a number of charitable contributions prior to his arrest in August 2010. These contributions included monetary donations and artwork, and were made to schools and other similar organizations. The Government has not sought to forfeit these items.

9. This declaration is not intended to include all the information known by me with respect to French's assets and finances or to identify all of the property not forfeited by the Government to date.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed at Richmond, Virginia this 17 day of June, 2011.

  
Special Agent Catherine L. Nowery  
Federal Bureau of Investigation

**From:** Lynn Tavenner [ltavenner@tb-lawfirm.com]  
**Sent:** Thursday, May 12, 2011 1:33 PM  
**To:** 'Bill Baldwin'; 'Paula S. Beran Esq.'  
**Cc:** Catherine.Nowery@ic.fbi.gov  
**Subject:** RE: Justin French

Receipt acknowledged. Thanks Bill.

Lynn L. Tavenner, Esquire  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, VA 23219  
Telephone: (804) 783-8300  
Telecopy: (804) 783-0178  
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CONFIDENTIALITY NOTICE: This electronic mail transmission has been sent by a lawyer. It may contain information that is confidential, privileged, proprietary, or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain, copy or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission. There is no intent on the part of the sender to waive any privilege, including the attorney-client privilege, that may attach to this communication. Thank you for your cooperation.

-----Original Message-----

From: Bill Baldwin [<mailto:billbaldwin@comcast.net>]  
Sent: Thursday, May 12, 2011 10:51 AM  
To: Lynn Lewis Tavenner Esq; Paula S. Beran Esq.  
Cc: [Catherine.Nowery@ic.fbi.gov](mailto:Catherine.Nowery@ic.fbi.gov)  
Subject: FW: Justin French

Lynn:

This is the email sent May 3, do not know why it did not arrive; am sending via my comcast account as that may be more reliable than the firm email.

Regards,

Bill

W. R. Baldwin, III, Esq. (VSB #16988)  
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**From:** Bill Baldwin [billbaldwin@comcast.net]  
**Sent:** Wednesday, May 11, 2011 11:52 AM  
**To:** Lynn Lewis Tavenner Esq. (ltavenner@tb-lawfirm.com)  
**Cc:** Paula S. Beran Esq. (pberan@tb-lawfirm.com)  
**Subject:** JG French

Know that just before his sentencing Justin gave me a Redskins football helmet (it appears to be a real one) signed by Darrell Green. The helmet is autographed in black marker "To Justin My buddy in business. Darrell Green 28 Redskins 20 years."

This helmet was seized by the FBI under their search warrant last summer and was returned a few weeks ago.

This helmet did not mean much to Justin since Green's company (Rostormel Financial Services) sued him and got a judgment.

No clue as to value. Ebay has a D. Green autographed helmet at \$150, <http://cgi.ebay.com/DARRELL-GREEN-AUTOGRAPH-SIGNED-HELMET-COA-TOPPS-HOF-/400124579254>, but this has a certificate of authenticity. And it does not have Justin's name (you decide if that is + or - on value).

Anyway, if you want the helmet it is yours. If you want to think about it, lmk.

I will take it home and leave it in my garage unless you want it now.

Sorry, no pix. If you want one I will take and send it.

Bill

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# Exhibit E

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF VIRGINIA

Division

In re

Case No.

Chapter

Debtor

## ORDER TO FILE SCHEDULES, STATEMENT AND LISTS

Upon consideration of the petition filed on \_\_\_\_\_, against the above-named debtor, an order for relief under Chapter \_\_\_\_\_ of Title 11 of the United States Code having been entered on \_\_\_\_\_, and the debtor having failed to file the appropriate schedules, statement and lists as required by the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules, pursuant to an order entered \_\_\_\_\_; it is

**ORDERED** that the petitioning creditor(s), by counsel, shall file the appropriate schedules, statement and lists as required by the Bankruptcy Code, Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules, together with a List of Creditors in the format specified by the Clerk's Office pursuant to Local Bankruptcy Rule 5005-1(D)(1)(d) on or before \_\_\_\_\_ pursuant to Federal Rule of Bankruptcy Procedure 1007(k).

The Clerk shall forward a copy of this order to counsel for the petitioning creditor(s), the interim trustee, if any, and the United States Trustee.

Date: \_\_\_\_\_

\_\_\_\_\_  
United States Bankruptcy Judge

NOTICE OF JUDGMENT OR ORDER  
ENTERED ON DOCKET: \_\_\_\_\_